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April 16, 2021

MOTION FOR EXTENSION OF TIME TO FILE MOTION

BY ECF

Honorable Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: Mario Altagracia v. Fer's Cleaners II Corp., et. al.
Case No. 21 Civ. 108 (VEC)

Dear Judge Caproni,

We are counsel to the plaintiff and we write with reference to the court's order dated April 2, 2021 [Docket 10] and respectfully request two (2) weeks to file the motion for default pursuant to the court's individual practices. One prior request for an extension was granted, to allow the defendants additional time to respond to the complaint. Having failed to do so, we asked the Clerk of Court to enter a notation of default, which was entered today. We now request two (2) weeks to prepare and file the appropriate motion, by the end of this month.

No pending deadlines will be affected. Thank you for your consideration of this case.

Respectfully submitted,

/s/ Peter H. Cooper

Peter H. Cooper Application GRANTED.

cc: All defendants (by Mail)

SO ORDERED.

Valerie Caproni

4/16/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE